

SEALED

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS

SAN ANTONIO DIVISION

FILED

MAR - 4 2014

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY **CLERK**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ALBERTO ACEVEDO, JR.,

Defendant.

SA 14 CR 0157

FB

CRIMINAL NO. _____

UNDER SEAL

MOTION TO SEAL

COMES NOW the United States of America, by and through its undersigned Special Attorney Brock E. Taylor, and requests that the Court order the Information, Waiver of Indictment, and Plea Agreement filed in the above captioned matter be sealed until the plea hearing. The United States further requests that the Court order the Information, Waiver of Indictment, and Plea Agreement be unsealed at the plea hearing.

1. In support of this motion, the undersigned respectfully submits that the attached Information, Waiver of Indictment, and Plea Agreement should be sealed in order to protect the interests of the parties and the public, consistent with the ends of justice.
2. The Defendant Alberto Acevedo, Jr. has agreed to cooperate with the United States and the State of Texas in the investigation of public corruption in Bexar County, Texas.
3. Premature public disclosures have already adversely impacted the United States' investigation of public corruption in Bexar County, Texas.

4. The Court's public records, including the docketing records, are available over the Internet. This Internet access gives members of the public the ability to review the Court's records. If the contents of the Information, Waiver of Indictment, and Plea Agreement are prematurely made available to the public, it could adversely impact the United States' investigation and prosecution of public corruption in Bexar County, Texas.

5. Scheduling conflicts prevent the parties from finalizing the Defendant's guilty plea until March 17, 2014.

6. The Defendant, through counsel, does not oppose this motion.

WHEREFORE, the United States requests that the Court order the Information, Waiver of Indictment, and Plea Agreement be sealed until the plea hearing. The United States further requests that the Court order the Information, Waiver of Indictment, and Plea Agreement be unsealed at the plea hearing.

Respectfully submitted,

ERIC HOLDER
United States Attorney General

STEVEN C. YARBROUGH
Acting United States Attorney
District of New Mexico



BROCK E. TAYLOR
Special Attorney
555 S. Telshor, Suite 300
Las Cruces, New Mexico 88011

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Seal was delivered via e-mail to Frank Perez, attorney for the defendant, on March 3, 2014.

A handwritten signature in black ink, appearing to read 'B. Taylor', is positioned above a horizontal line.

BROCK E. TAYLOR
Special Attorney